



January 12, 2004

VIA OVERNIGHT DELIVERY

Mary Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 03-60; Responses of CTC Communications Corp. to the Joint Parties First Set of Discovery Requests

Dear Ms. Cottrell:

Enclosed please find the responses of CTC Communications Corp. (CTC) to the Joint Parties First Set of Discovery Requests in the abovementioned proceeding. Pursuant to the Protective Order adopted by the Department in this proceeding, CTC requests confidential treatment of the commercially sensitive information provided in the form of attachments to the responses to question numbers 5, 9 and 11. CTC has marked those attachments "CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER" and files them herewith in a sealed envelope.

Ms. Pamela L. Hintz, Vice President of Regulatory Affairs of CTC, is responsible for the preparation of these responses.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Pamela L. Hintz", with a stylized flourish at the end.

Pamela L. Hintz
Vice President of Regulatory Affairs

Enclosure

cc: Paula Foley, Hearing Officer (w/ enclosure)

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-1:

Please state whether you are either an incumbent local exchange provider (“ILEC”) providing telecommunications service in the Massachusetts or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

RESPONSE: CTC is not an incumbent local exchange provider, nor is it affiliated with an incumbent local exchange provider.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-2:

Please state whether you are either a competitive local exchange carrier (“CLEC”) providing telecommunications service in Massachusetts or an affiliate of such a CLEC. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

RESPONSE: CTC is a competitive local exchange carrier providing telecommunications service in Massachusetts.

Responsible Person: **Pamela Hintz**

Response Date: **January 12, 2004**

JOINT PARTIES-3:

Do you lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS1 or above circuit.)

RESPONSE: CTC does not lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-4:

Do you use non-ILEC switches to provide local exchange service to Massachusetts customers via analog voice-grade loops? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.)

RESPONSE: CTC does not use non-ILEC switches to provide local exchange service to Massachusetts' customers via analog voice-grade loops.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-5:

To the extent that you have not already provided this information in response to the Department's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers.

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");

RESPONSE: This information has already been provided in the Company's responses to the Department's Information Requests. In addition, the information is identified in the LERG.

- b. street address, city and zip code;

RESPONSE: This information has already been provided in the Company's responses to the Department's Information Requests. In addition, the information is identified in the LERG.

- c. currently equipped line side capacity in

- i. DS-0/voice grade circuits and
- ii. DS-1 circuits;

RESPONSE: This information is provided in Exhibit A pursuant to the confidentiality provisions of the Protective Order in this docket.

- d. currently utilized line side capacity in

- i. DS-0/voice grade circuits and
- ii. DS-1 circuits;

RESPONSE: This information is provided in Exhibit A pursuant to the confidentiality provisions of the Protective Order in this docket.

- e. current switch processor capacity in CCS;

RESPONSE: 100 calls per second

- f. busy hour and busy season utilized switch processor capacity in CCS;

Responsible Person: Pamela Hintz

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RESPONSE: CTC customer calling patterns are not seasonal and therefore the company does not currently track “busy season” CCS. With respect to busy hour, on average, during busy hour, the switch currently averages 23 calls per second.

- g. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

RESPONSE: CTC switch is a multi-function stand-alone switch.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-6:

Please provide the following general information regarding any local exchange service that you currently offer to customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

RESPONSE: Not applicable. See Response to JOINT PARTIES-4 above.

- a. Do you currently provide local exchange service to residential customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].
- b. Do you currently provide local exchange service to business customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.
- c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using analog voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers ?	Available to Bus. Customers ?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-7:

If you offer cable telephony service in Massachusetts, please state:

RESPONSE: Not applicable. CTC does not provide cable telephony service in Massachusetts.

- a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?
- b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service?
- c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?
- d. To what percent of your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-8:

If you are a CLEC offering circuit-switched local exchange service in Massachusetts, for each month or quarter over the most recent 12-month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis:

RESPONSE: Not applicable. CTC does not offer circuit-switched local exchange service in Massachusetts.

- a. The number of newly installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- b. The number of newly installed business lines served by UNE-P;
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- c. The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

Responsible Person: **Pamela Hintz**

Response Date: **January 12, 2004**

- d. The number of newly installed residential lines served by UNE-P.
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-9:

Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches.

RESPONSE: None. CTC does not provide circuit switching in Massachusetts

- b. Installed business lines served by UNE-P;

RESPONSE: This information is provided in Exhibit B pursuant to the confidentiality provisions of the Protective Order in this docket.

- c. Installed business lines served by non-circuit switches;

RESPONSE: This information was provided to the DTE in CTC's response to the DTE's data requests.

- d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches.

RESPONSE: None.

- e. Installed residential lines served by UNE-P;

RESPONSE. None

- f. Installed residential lines served by non-circuit switches.

RESPONSE: None

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-10:

For each switch your company operates in Massachusetts, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

TABLE 1A

CLEC Switch CLI	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers²

RESPONSE: Not applicable. All CTC facilities-based local exchange customers are provisioned via T-1 or higher loop facilities.

TABLE 1B

ILEC Wire Center	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers²

RESPONSE: Not applicable. All CTC on-net customers are provisioned via T-1 or higher loop facilities.

TABLE 1C

Massachusetts		Number	Type of	Number	Number	Number of
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CTC Communications Corp.
D.T.E. 03-60 – Responses
Joint CLEC Data Requests

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

	Number Of Loops Per End- User Customer Premises	of Local Service End-User Customers	End-User Customer	of Voice Only End User Customers ¹	of DSL Only End User Customers	Voice and DSL End User Customers²

RESPONSE: Not applicable. All of CTC's facilities-based local exchange customers are provisioned via T-1 or higher loop facilities.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-11:

For each switch that your company operates in Massachusetts other than circuit switches, please provide the following:

- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;

RESPONSE: CTC began providing service using its soft switch in December 1999.

- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;

RESPONSE: CTC has not deployed any circuit switches in its network. The Massachusetts serving wire centers in which CTC is providing service are identified in CTC's responses to the MA DTE initial data requests.

- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

RESPONSE: This information is provided in Exhibit C pursuant to the confidentiality provisions of the Protective Order.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-12:

Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

RESPONSE: CTC objects to this question as the information requested is on file with the MA DTE and available for public inspection.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-13:

Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating “Yes” or “No” in each box.

	TO VZ voice only	To VZ voice plus DSL	To VZ DSL	TO CLEC UNE-P voice only	To CLEC switch- based voice only	To CLEC line sharing	To CLEC line splitting	TO CLEC DSL only
FROM VZ voice only	*	*	*			*	*	*
FROM VZ voice plus DSL	*	*	*			*	*	*
FROM VZ DSL only	*	*	*			*	*	*
FROM CLEC UNE-P voice only	*	*	*			*	*	*
FROM CLEC switch- based voice	*	*	*			*	*	*

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

only								
FROM CLEC line sharing	*	*	*			*	*	*
FROM CLEC line splitting	*	*	*			*	*	*
FROM CLEC DSL only	*	*	*			*	*	*

RESPONSE: CTC objects in part to this question as to those responses identified with an asterisk as the questions are not applicable to CTC's operations. CTC objects to this question in whole as it is not relevant to the proceeding.

Responsible Person: **Pamela Hintz**

Response Date: **January 12, 2004**

JOINT PARTIES-14:

Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

RESPONSE: It is CTC’s understanding that Verizon does not maintain electronic CSR’s for customers served by UNE-P providers.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-15:

Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

RESPONSE: CTC objects to this question as it not relevant to this portion of the impairment determination proceeding. CTC also objects to this question on the grounds that CTC as well as the requesting parties have access to the same Verizon OSS that are available to all CLECs

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-16:

Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

RESPONSE: CTC's objects to this question on the grounds that it is not relevant to this proceeding.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-17:

Please explain whether you currently have in place and use electronic automated systems to:

RESPONSE: CTC objects to this question on the grounds that the question is not relevant to this proceeding. CTC further objects on the grounds that information regarding the specific capabilities of its Operational Support Systems (OSS) is considered highly sensitive and proprietary. Without waiving the foregoing objections, CTC both has in place and utilizes electronic automated OSS.

- a. Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c. Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches. If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

JOINT PARTIES-18:

Please state:

- a. Whether your company has ever applied for Eligible Telecommunications Carrier (“ETC”) status in Massachusetts.

RESPONSE: CTC has not applied for Eligible Telecommunications Carrier status in Massachusetts.

- e. If there answer to (a) is yes, please state whether ETC status was granted, the DTE case number in which it was granted, and the date of the order approving the status.

RESPONSE. Not applicable.

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

EXHIBIT A
CONFIDENTIAL –
SUBJECT TO PROTECTIVE ORDER

JOINT PARTIES-5:

To the extent that you have not already provided this information in response to the Department's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers.

c. currently equipped line side capacity in

- i. DS-0/voice grade circuits and
- ii. DS-1 circuits;

*****CONFIDENTIAL*****

d. currently utilized line side capacity in

- i. DS-0/voice grade circuits and
- ii. DS-1 circuits;

*****CONFIDENTIAL*****

Responsible Person: **Pamela Hintz**

Response Date: **January 12, 2004**

EXHIBIT B
CONFIDENTIAL –
SUBJECT TO PROTECTIVE ORDER

JOINT PARTIES-9:

Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- c. Installed business lines served by UNE-P;

*******CONFIDENTIAL*******

Responsible Person: Pamela Hintz

Response Date: January 12, 2004

EXHIBIT C
CONFIDENTIAL –
SUBJECT TO PROTECTIVE ORDER

JOINT PARTIES-11:

For each switch that your company operates in Massachusetts other than circuit switches, please provide the following:

- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

*****CONFIDENTIAL*****